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11 Attorneys for Defendants
12 FIDELITY NATIONAL TITLE GROUP,
13 INC., COMMONWEALTH LAND TITLE
14 INSURANCE COMPANY, FIDELITY
15 NATIONAL TITLE INSURANCE
COMPANY, CHICAGO TITLE OF
NEVADA, INC., and FIDELITY
NATIONAL TITLE AGENCY OF NEVADA,
INC.

16 **UNITED STATES DISTRICT COURT**
17 **DISTRICT OF NEVADA**

19 BANK OF AMERICA, N.A., AS
20 SUCCESSOR BY MERGER TO BAC
21 HOME LOANS SERVICING, LP,
22 Plaintiff,
23 vs.
24 FIDELITY NATIONAL TITLE GROUP,
INC., et al.,

25 Defendants.
26
27

28 Case No.: 2:21-cv-00348-CDS-BNW

**STIPULATION AND PROPOSED
ORDER TO EXTEND TIME FOR
DEFENDANTS TO FILE REPLY
BRIEFS IN SUPPORT OF MOTIONS
DISMISS**

(FIRST REQUEST)

1 Plaintiff Bank of America, N.A. (“BANA”) and Defendants Commonwealth Land Title
2 Insurance Company, Fidelity National Title Insurance Company, Chicago Title of Nevada, Inc.,
3 and Fidelity National Title Agency of Nevada, Inc. (collectively, “Defendants,” and with BANA,
4 the “Parties”), by and through their counsel of record, hereby stipulate and agree as follows:

5 **WHEREAS**, on February 11, 2022, BANA filed its First Amended Complaint [ECF No.
6 33];

7 **WHEREAS**, on February 24, 2022, Commonwealth Land Title Insurance Company and
8 Fidelity National Title Insurance Company filed a Motion to Dismiss BANA’s First Amended
9 Complaint [ECF No. 34];

10 **WHEREAS**, on February 24, 2022, Chicago Title of Nevada, Inc. and Fidelity National
11 Title Agency of Nevada, Inc. filed a Motion to Dismiss BANA’s First Amended Complaint [ECF
12 No. 36];

13 **WHEREAS**, on April 25, 2022, BANA filed an Opposition to Chicago Title of Nevada,
14 Inc. and Fidelity National Title Agency of Nevada, Inc.’s Motion to Dismiss [ECF No. 50];

15 **WHEREAS**, on April 25, 2022, BANA filed an Opposition to Commonwealth Land Title
16 Insurance Company and Fidelity National Title Insurance Company’s Motion to Dismiss [ECF No.
17 51];

18 **WHEREAS**, Defendants’ reply briefs in support of the motions to dismiss were due on
19 May 2, 2022;

20 **WHEREAS**, BANA has agreed to extend Defendants’ deadlines to file their reply briefs
21 by two weeks, such that the briefs would be due on May 16, 2022, to afford Defendants’ counsel
22 additional time to review the arguments raised by the opposition briefs and formulate a response
thereto;

23 **WHEREAS**, this is the first request for an extension of time, the extension of time is not
24 sought for any improper purpose, and will not prejudice any party.

25 **NOW THEREFORE**, the Parties, by and through their undersigned counsel, hereby
26 stipulate and agree as follows:

1. Defendants' deadlines to file reply briefs in support of the motions to dismiss (ECF
2 Nos. 34 and 36) will be May 16, 2022;

3 **IT IS SO STIPULATED.**

4
5 Dated: May 6, 2022

EARLY SULLIVAN WRIGHT
GIZER & MCRAE LLP

6 By: /s/-- Scott E. Gizer

7 SCOTT E. GIZER

8 SOPHIA S. LAU

9 Attorneys for Defendants FIDELITY
10 NATIONAL TITLE GROUP, INC.,
11 COMMONWEALTH LAND TITLE
12 INSURANCE COMPANY, FIDELITY
13 NATIONAL TITLE INSURANCE
14 COMPANY, CHICAGO TITLE OF NEVADA,
15 INC., and FIDELITY NATIONAL TITLE
16 AGENCY OF NEVADA, INC.

17
18 Dated: May 6, 2022

19 MCCORMICK, BARSTOW, SHEPPARD,
20 WAYTE & CARRUTH LLP

21 By: /s/-- Michael A. Pintar

22 MICHAEL A. PINTAR

23 Attorneys for Defendants FIDELITY
24 NATIONAL TITLE GROUP, INC.,
25 COMMONWEALTH LAND TITLE
26 INSURANCE COMPANY, FIDELITY
27 NATIONAL TITLE INSURANCE
28 COMPANY, CHICAGO TITLE OF NEVADA,
A., and FIDELITY NATIONAL TITLE
AGENCY OF NEVADA, INC.

Dated: May 6, 2022

WRIGHT FINLAY & ZAK, LLP

By: /s/-Lindsay D. Dragon

LINDSAY D. DRAGON

Attorneys for Plaintiff BANK OF AMERICA,
N.A.

25 **IT IS SO ORDERED:**

26
27 Dated: May 12, 2022

28 By: 
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on May 6, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this Case.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/ Robie Ann Atienza-Jones

ROBIE ANN ATIENZA-JONES
An Employee of EARLY SULLIVAN
WRIGHT GIZER & McRAE LLP